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Bob Pooler
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USDA-AMS-TMP-NOP
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Ag Stop 0268
Washington, D.C. 20250
Sent via E-Mail to: National.List@usda.gov

August 2, 2006

RE: Docket No. TMD-06-04

Dear Mr. Pooler:

Thank you for the opportunity to comment on the proposed amendments to the USDA National List of Allowed and Prohibited Substances (National List), Docket Number TMD-06-04.

Pennsylvania Certified Organic (PCO) supports the addition of the following items to the National List as annotated:

205.601(e)(9) Sucrose octonate esters (CAS #s 42922-74-7; 58064-47-4)—in accordance with approved labeling.

205.603(b)(7) Sucrose octonate esters (CAS #s 42922-74-7; 58064-47-4)—in accordance with approved labeling.

Sucrose octonate esters are the active ingredient in EPA registered pesticides with uses in crop production (particularly of interest for control of sciarid flies in mushrooms) and for livestock as used to treat Varroa mites in honeybees. Varroa mites are difficult to control organically so this is a welcome new addition.

At present, due to lack of clarification of USDA NOP honey standards, (especially concerning forage area required, buffer zones, and the prevention of contamination) PCO does not certify any honey producers. However, honey is imported from Canada that is certified as USDA organic. We request further clarification of NOP standards for organic honey production so that Pennsylvania producers are not at a disadvantage for marketing organic domestic honey.

We also appreciate the notice that the substance chitosan is considered permitted for use by NOP when used as an adjuvant with other permitted active ingredients, since it is classified by EPA as List 4 inert ingredient, and thus meets the requirements of 7 CFR 205.601(m). We assume this means that adjuvants, additives, and spreader-stickers used on farm in mixtures formulated by growers can generally be permitted if the substances are on EPA List 4 and the active ingredients are compliant with NOP rules.

We realize that this substances has additional use as an active pesticidal ingredient with fungicidal or plant growth regulator functions. Although the NOSB did not recommend it as a stand-alone active ingredient, due to limited information available, we expect that if additional information is supplied via a new petition, these uses could be considered. Organic farmers have limited options for plant disease control, and are interested in alternatives to the use of copper and sulfur due to negative impacts on soil microbes and beneficial insects. Copper can also accumulate in the soil. Alternative materials that have a more benign environmental profile should be considered for organic crop production.

Sincerely,

Leslie Zuck, Executive Director

Emily Brown Rosen, Materials Review Manager

Pennsylvania Certified Organic